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Nevada State Bar No. 505

JOSHUA R. HARRIS, ESQ.

Nevada State Bar No. 9580

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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JACQUELYN A. MARZAN,

Plaintiff,

vs.

KILOLO KIJAKAZI,
Commissioner of Social Security
Administration,

Defendant.

Case No 2:21-cv-01647-DJA

FIRST STIPULATION AND
~~[PROPOSED]~~ ORDER FOR
EXTENSION OF TIME TO FILE
MOTION FOR REMAND

Comes now Plaintiff, by and through her attorney, JOSHUA R. HARRIS, ESQ., and requests a TWENTY-NINE (29) calendar day extension of time, to file the **MOTION FOR REMAND**, up to and including April 1, 2022.

Plaintiff's current deadline to file the **MOTION FOR REMAND** is March 3, 2022..

The Appellate Attorney Writer had multiple briefs due in a short-time span and had pandemic related staff reductions.

Via email on February 24, 2022, at 8:08am, opposing counsel expressed no objection to the extension.

1 It is therefore respectfully requested that Plaintiff be granted a TWENTY-NINE (29)
2 calendar day extension of time, to file the **MOTION FOR REMAND**, up to and including
3 April 1, 2022.

4 DATED this 28th day of February, 2022.

DATED this 28th day of February, 2022.

5 /s/ Joshua R. Harris

6 **JOSHUA HARRIS, ESQ.**

7 Nevada State Bar No. 9580

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Attorney for Plaintiff

/s/ Allison Cheung

ALLISON CHEUNG

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Attorneys for Defendant

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13 IT IS SO ORDERED.

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16 Hon. Daniel J. Albregts
17 United States Magistrate Judge

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19 DATED: March 1, 2022
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CERTIFICATE OF SERVICE

I, Noel S. Anschutz, Paralegal, certify that the following individual was served with a copy of the FIRST STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO FILE MOTION FOR REMAND on the date and via the method of service identified below:

CM/ECF:

ALLISON CHEUNG
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Attorneys for Defendant

DATED: February 28, 2022
/s/ Noel S. Anschutz, Paralegal